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Counsel for Plaintiff
Viral DRM LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VIRAL DRM LLC,

Plaintiff,

v.

ANTON SHUBSTORSKY,

Defendant.

CASE NO.: 3:24-cv-00733-JSC

**DECLARATION OF MATTHEW L. ROLLIN
IN SUPPORT OF APPLICATION FOR
ENTRY OF CLERK’S DEFAULT**

I, Matthew L. Rollin, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff VIRAL DRM LLC (“Viral DRM”) in the above-captioned matter. I make this Declaration, which is filed in support of Viral DRM's Motion for Entry of Clerk’s Default, and I could and would testify competently to the matters set forth herein.

2. On February 7, 2024, Viral DRM filed its Complaint against Defendant ANTON SHUBSTORSKY (“Shubstorsky”) [ECF 1].

3. On June 11, 2024, Shubstorsky was served with his Summons and the Complaint by alternate service by serving Shubstorsky via the email address provided by Shubstorsky and Google, with a direct link to the www.sriplaw.com/notice website where all documents associated with this

1 matter available for Shubstorsky to access and download, and on June 12, 2024, Shubstorsky was
2 also served by alternate service by a WhatsApp message via the phone number provided by
3 Shubstorsky and/or Google, which also contained a direct link to the www.sriplaw.com/notice
4 website. Attached hereto as Exhibit “A” is a true and correct copy of the Affidavit of Service on file
5 with the Court, reflecting that Shubstorsky was served by alternate service with the Summons and a
6 copy of the Complaint.

7 4. The time allowed for Shubstorsky to respond to the Complaint has expired.

8 5. Shubstorsky has not been granted an extension of time to respond to the Complaint.

9 6. Shubstorsky has failed to answer or otherwise respond to the Complaint, or serve a
10 copy of his Answer or other response upon Viral DRM’s attorneys of record.

11 7. I am informed and do not believe that Shubstorsky is an infant or incompetent person,
12 and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

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16 Executed on July 8, 2024

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18 /s/ Matthew L. Rollin

19 MATTHEW L. ROLLIN
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